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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING THE
ADMISSIBILITY OF CERTAIN
DOCUMENTS RELATING TO GOOGLE
EMPLOYEE SABINE BORSAY**

Referral: The Honorable Susan van Keulen

1 Pursuant to Civil Local Rule 7-12, this joint stipulation is entered into between Plaintiffs
2 and Google LLC (“Google”) (collectively, the “Parties”).

3 WHEREAS, the Court previously ordered the deposition of Google employee Sabine
4 Borsay subject to certain limitations (Dkts. 447, 469-3);

5 WHEREAS, the *Brown* Plaintiffs will depose Ms. Borsay on June 30, 2022, with a limit of
6 three hours for their questioning of Ms. Borsay;

7 WHEREAS, on June 17, 2022, given the limited amount of time provided for the *Brown*
8 Plaintiffs to question Ms. Borsay, Plaintiffs asked Google whether it would stipulate to the
9 admissibility of certain documents produced by Google from Ms. Borsay’s files;

10 WHEREAS, on June 23, 2022, Google produced additional documents from the files of
11 Ms. Borsay based on Google’s privilege re-review;

12 WHEREAS, Google has agreed that it will not object to the admissibility of any of the
13 documents identified in Exhibit A;

14 WHEREAS, Google will in good faith continue to negotiate with Plaintiffs regarding the
15 admissibility of additional documents, including without limitation from any productions based on
16 Google’s privilege re-review; however the parties have no obligation to reach any further
17 stipulation on admissibility of trial evidence prior to the stipulation included with the submission
18 of the Trial Readiness Binder;

19 NOW THEREFORE, the Parties stipulate as follows:

- 20 1. For trial and all other purposes, Google waives any objection to the admissibility of
21 the 32 documents listed in Exhibit A and agrees that Plaintiffs need not mark any of
22 these documents as exhibits during the deposition of Ms. Borsay in order to establish
23 a basis for their admission at trial; and
- 24 2. Consistent with Judge Gonzalez Rogers’ requirements, the Parties will continue in
25 good faith to stipulate to admissibility of additional documents as exhibits for
26 purposes of trial, including without limitation any productions in connection with
27 Google’s privilege re-review; however the parties have no obligation to reach any
28 further stipulation on the admissibility of trial evidence prior to the stipulation

included with the submission of the Trial Readiness Binder.

DATED: June 29, 2022

QUINN EMANUEL URQUHART &
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/s/ Andrew Schapiro

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Attorneys for Plaintiffs

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9 *Attorneys for Defendant Google LLC*

EXHIBIT A

1. GOOG-BRWN-00457256
2. GOOG-CABR-05468324
3. GOOG-CABR-04970004
4. GOOG-CABR-03750737
5. GOOG-BRWN-00051404
6. GOOG-BRWN-00166653
7. GOOG-CABR-05836882.C
8. GOOG-BRWN-00391825
9. GOOG-CABR-04154452
10. GOOG-CABR-00352924
11. GOOG-BRWN-00418175
12. GOOG-BRWN-00391231
13. GOOG-BRWN-00183943
14. GOOG-BRWN-00183662
15. GOOG-CABR-04430816
16. GOOG-BRWN-00165567
17. GOOG-BRWN-00063504
18. GOOG-CABR-00413286
19. GOOG-BRWN-00047341
20. GOOG-CABR-00095921
21. GOOG-CABR-05144251
22. GOOG-CABR-05892543
23. GOOG-CABR-00141578
24. GOOG-CABR-05757174
25. GOOG-CABR-04508763
26. GOOG-CABR-00358713
27. GOOG-CABR-04738550

1 28. GOOG-CABR-04484908

2 29. GOOG-CABR-04746237

3 30. GOOG-CABR-04509467

4 31. GOOG-CABR-04746237

5 32. GOOG-CABR-04746153

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ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: June 29, 2022

By /s/ Amanda Bonn
Amanda Bonn
Counsel on behalf of Plaintiffs

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that Google has waived any objection to the admissibility of the 32 documents listed in Exhibit A and agreed that Plaintiffs need not mark any of the following documents as exhibits during the deposition of Ms. Borsay in order to establish a basis for their admission at trial:

1. GOOG-BRWN-00457256
2. GOOG-CABR-05468324
3. GOOG-CABR-04970004
4. GOOG-CABR-03750737
5. GOOG-BRWN-00051404
6. GOOG-BRWN-00166653
7. GOOG-CABR-05836882.C
8. GOOG-BRWN-00391825
9. GOOG-CABR-04154452
10. GOOG-CABR-00352924
11. GOOG-BRWN-00418175
12. GOOG-BRWN-00391231
13. GOOG-BRWN-00183943
14. GOOG-BRWN-00183662
15. GOOG-CABR-04430816
16. GOOG-BRWN-00165567
17. GOOG-BRWN-00063504
18. GOOG-CABR-00413286
19. GOOG-BRWN-00047341
20. GOOG-CABR-00095921
21. GOOG-CABR-05144251
22. GOOG-CABR-05892543
23. GOOG-CABR-00141578

1 24. GOOG-CABR-05757174

2 25. GOOG-CABR-04508763

3 26. GOOG-CABR-00358713

4 27. GOOG-CABR-04738550

5 28. GOOG-CABR-04484908

6 29. GOOG-CABR-04746237

7 30. GOOG-CABR-04509467

8 31. GOOG-CABR-04746237

9 32. GOOG-CABR-04746153

10 Consistent with Judge Gonzalez Rogers' requirements, the Parties will continue in good
11 faith to stipulate to admissibility of additional documents as exhibits for purposes of trial,
12 including without limitation any productions in connection with Google's privilege re-review;
13 however the parties have no obligation to reach any further stipulation on the admissibility of trial
14 evidence prior to the stipulation included with the submission of the Trial Readiness Binder.

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16 **PURSUANT TO STIPULATION IT IS SO ORDERED.**

17 DATED: _____

18 Hon. Susan van Keulen,
19 United States Magistrate Judge
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